

Docket No. CITI0049-CON

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the U.S. Application of

James ZEANAH, et al.

U.S. Serial No.: 09/323,210

Filed: June 01, 1999



Group Art Unit: 2122

Examiner: Ingberg, T.

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For: SYTEM AND METHOD FOR DELIVERING FINANCIAL SERVICES

APPEAL BRIEF

Box AF

Commissioner of Patents

Washington, D.C. 20231

Sir:

This is an Appeal Brief under 37 C.F.R. § 1.192 in connection with the decisions of the Examiner in a final Office Action mailed on December 5, 2001. Each of the topics required by Rule 192 is presented herewith and is labeled appropriately.

**(1) Real Party In Interest**

The real party in interest is Citicorp Development Center, Inc. (formerly Transaction Technology, Inc.)

**(2) Related Appeals And Interferences**

There are no other appeals or interferences related to this case.

**(3) Status Of Claims**

Claims 58-111 are pending and rejected. Claims 58-111 are hereby appealed.

**(4) Status of Amendments**

There are no outstanding amendments.

**(5) Summary Of The Invention**

The present invention is directed to a system and method for delivering financial services to a plurality of different devices. Page 1, lines 17-18. Through those different devices, such as personal computers, screen phones, ATMs, PDAs, and/or internal staff terminals, customers or employees of a financial institution have remote access to the delivered financial services, and they can select mini-app dialog components to perform functions. Page 5, lines 18-29. Upon selection of a function by a customer or employee, the mini-app dialog component collects information needed to perform the requested function and instantiates a transaction executor component to carry out the function. Id. The system and method of the present invention can separate content from format to accommodate variations in the remote devices. The system also includes: 1) a presentation manager for mapping messages between a canonical representation and a format recognized by a particular remote device, page 6, lines 1-5; 2) a rule broker component that other components within the system may query to obtain an answer to any question that might arise, page 6, lines 27-30; and 3) a legacy app bridge component that converts data from a

canonical representation to the global data structure needed by the legacy applications, page 7, lines 6-9.

**(6) Issues**

- a) Whether the Examiner's rejection of claims 58-67, 69, and 72-107 under 35 U.S.C. 102(a) as being anticipated by Mark Gibbs et al., "Absolute Beginner's Guide To Networking, Second Edition," November 21, 1994" (Network) is proper.
- b) Whether the Examiner's rejection of claims 68 and 70 under 35 U.S.C. § 103(a) as being unpatentable over Hilt (U.S. Pat. No. 5,465,206) is proper.
- c) Whether the Examiner's rejection of claim 71 under 35 U.S.C. 103(a) as being unpatentable over Hawkins (U.S. Pat. No. 6,000,000) is proper.
- d) Whether the Examiner's rejection of claims 108 and 109 under 35 U.S.C. 102(a) as being anticipated by Martin, "Principles of Object Oriented Analysis and Design," June 1, 1992 (Martin) is proper.
- e) Whether the Examiner's rejection of claims 110 and 111 under 35 U.S.C. 103(a) as being unpatentable over Network in view of Martin is proper.

**(7) Grouping of Claims**

Claims 58-111 are arranged into 16 groups, wherein the claim(s) in each group stand or fall together for purposes of this appeal.

GROUP	CLAIMS
(1)	58-63, 66, 67, 69
(2)	64
(3)	65
(4)	72-84, 86-89, 93
(5)	85
(6)	90
(7)	91
(8)	92
(9)	94-97, 100-107
(10)	98
(11)	99
(12)	68, 70
(13)	71
(14)	108
(15)	109
(16)	110, 111

**(8) Argument**

**The Rejection of Claims 58-67, 69, and 72-107 Under 35. U.S.C. § 102(a) As Being Anticipated by “Absolute Beginner’s Guide to Networking” (Network) is Not Proper**

In the final Office Action dated December 5, 2001 (12/05/01), the Examiner repeated the rejection of claims 58-63, 66, 67, and 69 with the same language found in a previous Office Action dated October 2, 2001 (10/02/01); of which, the rejection of claim 58 is recited below.

**Network** anticipate [sic] a system for delivering services from a host site to a remote

device (**Network**, page 322, Login to Server and **Network**, page 378, Security), comprising: a mini-app dialog component for receiving a request for a service function from the remote device; and a transaction executor component instantiated by the mini-app dialog component to perform the requested service function (**Network**, page 323, the Script to attach and logon). Final Office Action of 12/05/01, page 3; Office Action of 10/02/01, page 13.

This rejection was traversed in the undersigned's response dated November 8, 2001

(11/08/01). However, the Examiner rebutted the response by stating that,

Applicant fails to acknowledge the rejection. The rejection was the transaction of login on the network. Software to handle the log on function must present to support the log on as taught by the reference. The process of login (sic) on is a transaction. The Applicant's claims were giving the broadest reasonable interpretation in view of the Specification. The argument is not persuasive nor seems to recognize the actual rejection. Final Office Action of 12/05/01, page 18.

The undersigned respectfully submits that it is difficult to acknowledge or recognize the Examiner's *actual* rejection when the language of such rejection is confusing and lacks evidence of the alleged disclosure found in the prior art, **Network**. In this instance, the above-recited Examiner's rejection is not clear whether the **Network**'s "Script to attach and logon" is meant to anticipate the claimed mini-app dialog component or transaction executor component. Even if the Examiner asserted that the "Script to attach and logon" anticipates one of the two claimed components, it is not clear from the rejection what item in **Network** is deemed by the Examiner to have anticipated the remaining component.

It has been requested that the Examiner provide clarification to the Examiner's rejection. Response of 11/08/01 (page 5). However, the Examiner merely repeated the language of rejection of claim 58 in the final Office Action of 12/05/01 without providing clarification to the rejection. Specifically, it is requested that the Examiner point out with

clarity where those two claimed components can be found in Network. As stated in the response of 11/08/01, a review of the cited sections of Network does not reveal a system comprising the claimed mini-app dialog component and transaction executor component. In fact, the Examiner's citation of pp. 322-323 of Network refers to the use of LANtastic to provide net login, and p. 378 of Network merely discusses network security. LANtastic, as known in the art, is a LAN (Local Area Network) operating system and not a dialog component. Hence, it is respectfully submitted that Network does not disclose a system comprising two separate components: a mini-app dialog component and a transaction executor component as claimed. The Examiner rebutted this response with the above-recited statements that are as confusing as the rejection which they attempt to support.

First of all, there is no claimed feature to "a transaction of login on the network." Consequently, the Examiner's rejection using statements such as "[t]he rejection was the transaction of login on the network" and "[t]he process of login on is a transaction" is misplaced and irrelevant. Secondly, the Examiner's statement that "[s]oftware to handle the log on function must present (sic) to support the log on as taught by the reference" appears to be a rejection based on inherency. Yet, this statement or assertion was not found in the Examiner's rejection in the first Office Action dated 10/02/01, nor was it found in the rejection language of the subsequent final Office Action of 12/05/01. The Examiner cannot make a single rejection with piece-meal assertions in two different Office Actions, and then finalize the later Office Action to prevent Applicants and/or the undersigned sufficient opportunity to respond to the subsequently-made assertions. In other words, the examiner

cannot make an unclear rejection and attempt to clarify the rejection with an unclear rebuttal all at the expense of requiring the undersigned to second guess the nature of the rejection.

Therefore, it is respectfully submitted that the finality of the Office Action dated 12/05/01 is incorrect and at best premature.

Responsive to the Examiner's rebuttal, it is respectfully pointed out that on pages 322-323 of Network (as cited by the Examiner), particularly Figures 12.1 and 12.2, there is reference to a LANtastic NET utility used to log into a server. Even if the LANtastic NET utility is considered to be the mini-app dialog component by the Examiner, as may or may not be the case due to the Examiner's unclear rejection and rebuttal, the Network's "Script to attach and logon" asserted by the Examiner cannot be considered as the claimed "transaction executor component instantiated by the mini-app dialog component to perform the requested service function." This is because the asserted Network's "Script to attach and logon," as best understood from the Examiner's unclear rejection, refers to the login scripts described in the second paragraph next to the last on page 323 of Network. These login scripts are run once the user logs into a server so that the login scripts can execute predetermined commands. Thus, the login scripts do not perform the requested function of login on the user, which is handled by the LANtastic NET utility used to log users into the server. In other words, the LANtastic NET utility or any other inherent logon software, does not instantiate the "Scripts to attach and logon", or a transaction executor component as claimed. Thus, it is respectfully submitted that claim 58 is allowable over the references of record, and the finality of the Office Action dated 12/05/01 is unwarranted.

Claims 58-63, 66, 67, and 69 stand or fall together with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal. For the reasons stated above, it is respectfully requested that the Board recognize the deficiencies in the Examiner's rejection of the claims, reverse the Examiner's rejection, and allow claims 58-63, 66, 67, and 69.

With regard to claim 64, the aforementioned reasons for the allowability of claim 58 also applies here. Claim 64 is also allowable for the following reasons: The Examiner repeated the rejection of claim 64 with the same language found in the previous Office Action of 10/02/01, as recited below.

The system as set forth in claim 63, further comprising a presentation manager component for mapping the information from the remote device into a canonical representation of the information (**Network**, page 439, Presentation layer by definition). Final Office Action of 15/05/01, page 4.

This rejection was traversed in the undersigned's response of 11/08/01. However, the Examiner rebutted the response by stating that,

The reference clearly shows computer screens displaying data. The format is a "canonical representation of the information", the device is remote device when displayed on a device such as the client in a client server architecture. The term presentation manager in the art does in fact relate to the Presentation layer of the OSI model. Since, the data is being displayed on the remote client in a format then the use of a presentation manager is in use. ***This argument is less than ordinary skill in the art and not persuasive.*** (Emphasis added). Final Office Action of 12/05/01, page 19.

The Examiner's above-recited rebuttal is respectfully traversed, and it is respectfully submitted that the last statement in the Examiner's rebuttal is unwarranted. Just because Network shows computer screens displaying data, it ***does not logically follow that the format of such data must be a canonical representation*** of the information. One of



ordinary skill in the art would have realized that there are a myriad of information representations that can be used to display data on a screen. Furthermore, claim 64 does not claim that the remote device displays data in a format that is a canonical representation of the information. In contrast, claim 64 provides for a presentation manager component that *maps the information from the remote device into a canonical representation* of the information.

One of ordinary skill in the art also would have understood that the OSI model is merely a loose standard for a functional system model set by the International Standards Organization (ISO). In other words, particulars of the OSI model are left to the system designers so long as the resulting system has the requisite layers, each generally functions according to the loose OSI model standard. As pointed out by the Examiner in referencing the glossary of Network, page 493, the OSI model includes seven layers, one of which is termed the presentation layer, loosely defined as the place “where the formatting and translation of data is performed so that the application layer can understand what is going on.” The OSI model does not demand or disclose that such data formatting and translation must involve canonical representation of data. Thus, as stated in the response dated 11/08/01, the definition as cited by the Examiner does not disclose the particulars of the claimed presentation manager component, including, the mapping and collection of information from the mini-app dialog component as *canonical representation* of the information from the remote device as claimed. In order to sustain rejection of anticipation under 35 U.S.C. 102, the reference cited must contain each and every limitation of the claim. The Examiner has failed to meet his/her burden.

With regard to claim 65, the aforementioned reasons for the allowability of claim 64 also applies here. As with claim 64, claim 65 does not claim that the remote device displays data that is a canonical representation of the information. In contrast, claim 65 provides that the information from the remote device *is collected* by the mini-app dialog component *as a canonical representation* of the information.

Claims 64 and 65 do not stand or fall together with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal. For the reasons stated above, it is respectfully requested that the Board recognize the deficiencies in the Examiner's rejection of the claims, reverse the Examiner's rejection, and allow claims 64 and 65.

With regard to claims 72 and 83, the aforementioned reasons for allowability of claims 64 and 65 also apply. Claims 72 and 83 are also allowable for the following reasons: The Examiner also repeated the rejection of claims 72 and 83 with the same language found in the previous Office Action of 10/02/01. This rejection was traversed in the response of 11/08/01. However, the Examiner rebutted the response by stating that,

The claim limitation are (sic) directed toward receiving a data transmission and converting the input stream into a format. The reference is a beginners (sic) guide to networking and covers these essential steps. Applicant's argument is whole (sic) unpersuasive. The claims read on the technology required to make a network function. An argument of hindsight in a 102 rejection to a claim that reads on how the OSI model works *is interesting but not persuasive*. (Emphasis added). Final Office Action of 12/05/01, page 19.

The Examiner is thanked for his comment that the arguments in the previous Office Action were *interesting*. However, the main purpose of the arguments was to be informative

and persuasive. Indeed, these arguments are *legally persuasive* because they are based on the MPEP and relevant case law. These arguments are repeated below.

To reject the limitations in claims 72 and 83, the Examiner pointed to different sections of Network (pp. 44, 70-71, 322, 378, 433) to show the disclosure of the claimed limitations. Yet, the Examiner failed to point out where in Network it is shown that the various cited sections are combined to arrive at the claimed invention in claims 72 and 83. As stated in the response date 11/08/01, according to MPEP 2131, which derives its legal reasonings and quotes from case law such as Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987), Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989), and In re Bond, 910 F.2d 83, 15 USPQ2d 1566 (Fed. Cir. 1990),

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference ... The identical invention must be known in as complete detail as is contained in the ... claim ... The elements must be arranged as required by the claim. MPEP 2131.

Thus, it is respectfully submitted that the gathering of various different features from various different sections of Network, to form the methods featured in claims 72 and 83 and its dependent claims, without evidence that they together function or are arranged as required by the claim, cannot be the basis for a rejection under 35 U.S.C. 102. Otherwise, such rejection is akin to a rejection based on a dictionary because all words of the claim can be found in the dictionary.

Claims 72-84, 86-89, and 93 stand or fall together with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal. For the

reasons stated above, it is respectfully requested that the Board recognize the deficiencies in the Examiner's rejection of the claims, reverse the Examiner's rejection, and allow claims 72-84, 86-89, and 93.

With regard to claim 85, the aforementioned reasons for the allowability of claim 83 also apply here. Furthermore, there is inconsistency in the Examiner's rejections of claims 58, 83, and 85. For claims 58 and 83, the Examiner appeared to refer to the Network's "Script to attach and logon" as the transaction executor component. Yet, for claim 85, the Examiner also appeared to refer to the Network's "Script to attach and logon" as the navigation shell. It is respectfully submitted that the language of claims 83 and 85 indicate that the transaction executor component and the navigation shell are two distinct entities. Therefore, the Examiner cannot use the Network's "Script to attach and logon" to cite against both the claimed transaction executor component and the navigation shell. Claim 85 stands or falls by itself with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal.

With regard to claim 90, the aforementioned reasons for the allowability of claim 83 also apply here. Furthermore, the Examiner rejected claim 90, stating that the claimed customer relationship component is anticipated by the definition of client/server. Final Office Action of 12/05/01, page 9. However, the broad definition of client/server on the Examiner's cited pages 70-71 and 433 of Network does not disclose the customer relationship component "***which contains information identifying a transactional relationship between the user and a host institution that provides the services to the user***"

as claimed. Claim 90 stands or falls by itself with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal.

With regard to claim 91, the aforementioned reasons for the allowability of claim 83 also apply here. Furthermore, the Examiner rejected claim 91, stating that the claimed issuer component is anticipated by a “response to a request on the server sideside (sic) in a Client Server architecture” found on page 71 of Network. First, it is unclear where such statement is found on page 71 of Network. Second, as stated in claim 91, the claimed issuer component “*contains information about a host institution that uses the system to provide services to users,*” which is not the same as the Examiner’s stated rejection. Claim 91 stands or falls by itself with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal.

With regard to claim 92, the aforementioned reasons for the allowability of claim 83 also apply here. Furthermore, the Examiner rejected claim 92, stating that the claimed acquirer component is anticipated by a “request from the Client side in a Client Server architecture” found on page 71 of Network. First, it is unclear where such statement is found on page 71 of Network. Second, as stated in claim 92, the claimed acquirer component “*contains information about an acquiring business for a session,*” which is not the same as the Examiner’s stated rejection. Claim 92 stands or falls by itself with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal.

With regard to claim 94, the Examiner rejected this claim “[g]iven an interpretation of login of a user – Network, page 323 and the session spawn by the login process.” Yet, the

Examiner did not explain further about his interpretation of the login of the user and where the claimed session controller component and its functions can be found in Network. Claims 94-97 and 100-107 stand or fall together with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal.

With regard to claim 98, the Examiner rejected this claim by merely reciting the language of the claim and simply indicating “[a]s per claim 63.” However, the Examiner did not reject claim 63 based on its claimed feature of “a mini-app dialog component *associated with each* of the session bubbles and for instantiating the transaction executor component associated with the respective session bubble.” Indeed, it is claim 98 that claims such feature. Therefore, the Examiner’s rejection does not sufficiently and/or clearly indicate where the claimed subject matter of claim 98 can be anticipated in Network. Claim 98 stands or falls by itself with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal.

With regard to claim 99, the Examiner rejected this claim by stating that the claimed interface component is anticipated by evidence of the logon screen and the client/server. Final Office Action of 12/05/01, page 11. It appears that the Examiner has used the general concept of the client/server architecture described in Network to anticipate numerous components claimed in various different claims of the present invention. Yet, time and again, the Examiner has failed to clearly and distinctly identify where each and every one of the claimed components can be found in Network. Once again, it is respectfully submitted that the Examiner cannot use a broad description of a single entity, i.e., client/server

architecture, disclosed in Network to reject numerous distinctly claimed components and their particular features and functions. Claim 99 stands or falls by itself with regard to the rejection under 35 USC §102(a) as being anticipated by Network for purposes of this appeal.

For the reasons stated above, it is respectfully requested that the Board recognize the deficiencies in the Examiner's rejection of the claims, reverse the Examiner's rejection, and allow claims 90-92 and 94-107.

**The Rejection of Claims 68, 70 and Claim 71 Under 35. U.S.C. § 103(a) As Being Unpatentable over Hilt (5,465,206) and over Hawkins (6,000,000), Respectively, is Not**

**Proper**

In the response of 11/08/01 to the previous Office Action of 10/02/01, the undersigned had assumed that claims 68 and 70 were actually rejected as being unpatentable over Network in view of Hilt and traversed accordingly. Likewise, the undersigned had assumed that claim 71 was actually rejected as being unpatentable over Network in view of Hawkins. Yet, in the final Office Action dated 12/05/01, the Examiner merely recited the same rejection in the Office Action of 10/02/01 without indicating whether the undersigned's assumption of the rejections is correct. This is another example of the lack of clarity in the Examiner's rejection.

If the rejection of claims 68, 70 and claim 71 under 35 U.S.C. 103(a) are based on Network in view of Hilt and Hawkins, respectively, it is respectfully submitted that the above reasons for the allowability of claim 58 also applies to claims 68, 70, and 71. However, if

the rejection of claims 68, 70 and claim 71 are based solely on Hilt or Hawkins, as so indicated in the Office Actions, it is hereby requested that the Examiner provide additional prior art that can be combined with Hilt and Hawkins to disclose the claimed invention because the Examiner did indicate that Hilt alone does not sufficiently teach the claimed limitations. Final Office Action of 12/05/01, page 13.

Claims 68 and 70 stand or fall together, and claim 71 stands by itself with regard to the rejection under 35 USC §103(a) as being unpatentable over Hilt (for claims 68 and 70) or Hawkins (for claim 71) for purposes of this appeal. For the reasons stated above, it is respectfully requested that the Board recognize the deficiencies in the Examiner's rejection of the claims, reverse the Examiner's rejection, and allow claims 68, 70, and 71.

**The Rejection of Claims 108 and 109 under 35 USC §102(a) as Being Unpatentable over Martin, "Principles of Object Oriented Analysis and Design" is Not Proper**

It is respectfully submitted that Martin does not disclose the claimed mini-app dialog component, transaction executor component, rule broker component, and their arrangements for at least the following reasons.

The Examiner asserted that the claimed mini-app dialog component is shown by "Martin, Client Server – a **client** is a software module that requests an operation[], a **server** is a software module that responds to the request, page 10," final Office Action of 12/05/01, page 24. Thus, the Examiner considered a client/server structure, with both a client and a server, to be the mini-app dialog component. As evidence by Martin, the terms client and



server are well known and well understood in the art. For instance, based on the language in the specification and the claims, one of ordinary skill in the art would have realized that the claimed system has a general client/server architecture, wherein a client refers to the remote device and a server refers to the host site. However, claim 108 does not provide for the client/server structure, i.e., both the remote device and the host site, to receive a request for a service function from the remote device. Indeed, claim 108 provides for a *mini-app dialog component* that receives a request for a service function from the *remote device*. Thus, the mini-app dialog component are distinctly described from the remote device (i.e., the client) or the host site (i.e., the server). If, as asserted by the Examiner, the mini-app dialog component is the entire client/server structure, it must follow that the mini-app dialog must receive a request for a service function from itself, i.e., the remote device, because the remote device is part of the client/server structure. Furthermore, if the mini-app dialog component is the entire client/server structure, then it is unclear what is considered by the Examiner to be the claimed transaction executor component and the rule broker component when such components are part of the system, i.e., the client/server structure, as claimed. Consequently, a client/server structure cannot be considered the claimed mini-app dialog component as asserted by the Examiner.

The Examiner asserted that the claimed transaction executor component is shown by “**Martin**, the point of diagrams produce code is repeated throughout the reference – ‘With OO Techniques and rules, we want the most direct translation of business policies into generated code,’ page 136,” final Office Action of 12/05/01, pp. 14-15. Claim 108 does not

claim that the transaction executor component perform any direct translation of business policies into generated code, as rejected by the Examiner using Martin. Indeed, claim 108 actually provides for “a transaction executor component instantiated by the mini-app dialog component to perform the requested service function,” which the Examiner did not reject.

Because the claimed mini-app dialog component and transaction executor component are not found in Martin, the claimed rule broker component and its claimed features *relating to the other two claimed components* are also not found in Martin.

Claim 108 stands or falls by itself with regard to the rejection under 35 USC §102(a) as being anticipated by Martin for purposes of this appeal. For the reasons stated above, it is respectfully requested that the Board recognize the deficiencies in the Examiner’s rejection of the claims, reverse the Examiner’s rejection, and allow claim 108.

With regard to claim 109, the aforementioned reasons for the allowability of claim 108 also applies here. Furthermore, the Examiner rejected claim 109 because Martin purportedly shows the system of claim 108 wherein the business rules are grouped in geographic region specific sets merely because Martin states that “Information engineering applies structured or OO[, i.e., object oriented,] techniques to the enterprise as a whole or to a large sector of the enterprise,” final Office Action of 12/05/01, page 15. It is respectfully submitted that just because the structured or OO techniques can be applied to a part or a whole enterprise, it does not follow that such techniques must be applied to the enterprise in *geographical region specific sets*. Indeed, the techniques can be applied to the enterprise in large sectors, wherein each sector is defined by common object oriented logic or common

functionalities and tasks. Thus, each sector does not have to be bounded by a geographical region set. Accordingly, Martin has not shown that business rules are grouped in geographical region specific sets as claimed.

Claim 109 stands or falls by itself with regard to the rejection under 35 USC §102(a) as being anticipated by Martin for purposes of this appeal. For the reasons stated above, it is respectfully requested that the Board recognize the deficiencies in the Examiner's rejection of the claims, reverse the Examiner's rejection, and allow claim 109.

**The Rejection of Claims 110 and 111 under 35 USC §103(a) as Being Unpatentable over Network in View of Martin is Not Proper**

With regard to claims 110 and 111, the aforementioned reasons for the allowability of claims 64 and 65 also apply here. The aforementioned reasons for the allowability of claim 109 also apply here. Claims 110 and 111 stand or fall together with regard to the rejection under 35 USC §103(a) as being unpatentable over Network in view of Martin for purposes of this appeal. For the reasons stated above, it is respectfully requested that the Board recognize the deficiencies in the Examiner's rejection of the claims, reverse the Examiner's rejection, and allow claims 110 and 111.

**Conclusion**

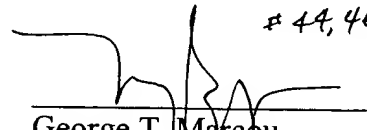
For at least the reasons given above, the rejections of claims 58-111 are improper. It is respectfully requested that such rejections by the Examiner be reversed and claims 58-111 be

allowed. Attached below for the Board's convenience is an Appendix of claims 58-111 as currently pending.

Respectfully submitted,

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**(9) Appendix**

58. A system for delivering services from a host site to a remote device, comprising:

a mini-app dialog component for receiving a request for a service function from the remote device; and

a transaction executor component instantiated by the mini-app dialog component to perform the requested service function.

59. The system as set forth in claim 58, wherein the service function is requested from a user at the remote device.

60. The system as set forth in claim 59, wherein the user includes a customer of the host site.

61. The system as set forth in claim 59, wherein the user includes an employee of the host site.

62. The system as set forth in claim 59, wherein the user includes a service provider external to the host site.

63. The system as set forth in claim 58, wherein the mini-app dialog component also collects information from the remote device.

64. The system as set forth in claim 63, further comprising a presentation manager

component for mapping the information from the remote device into a canonical representation of the information.

65. The system as set forth in claim 63, wherein the information from the remote device is collected by the mini-app dialog component as a canonical representation of the information.

66. The system as set forth in claim 64, wherein the information from the remote device is in a format designated for the remote device.

67. The system as set forth in claim 58, wherein the remote device comprises a computer.

68. The system as set forth in claim 58, wherein the remote device comprises a telephone.

69. The system as set forth in claim 58, wherein the remote device comprises a display device.

70. The system as set forth in claim 58, wherein the remote device comprises an automated teller machine.

71. The system as set forth in claim 58, wherein the remote device comprises a personal data assistant.

72. A method for delivering services from a host site to one or more users through one or more remote devices, comprising:

receiving a first request for a service function from a first user through a first remote device, wherein the first request for a service function is in a first format designated for a first remote device;

converting the first request for a service function from the first format into a canonical format;

performing the first requested service function based on the canonical format of the first request for a service function.

73. The method as set forth in claim 72, further comprising:

outputting a welcome page to the first user through the first remote device; and  
collecting the first user's identity and preference information.

74. The method as set forth in claim 72, further comprising:

generating a first response relating to the first performed service function;  
formatting the first response in the first format designated for the first remote device;  
and  
sending the first formatted response to the first user through the first remote device.

75. The method as set forth in claim 72, further comprising:

instantiating a mini-app dialog component.

76. The method as set forth in claim 72, wherein performing the first requested service function comprises:

collecting sufficient information from the first user; and

instantiating a transaction executor component to perform the first requested service function.

77. The method as set forth in claim 72, further comprising:

receiving a second request for a service function from a second user through a second remote device, wherein the second request for a service function is in a second format designated for a second remote device;

converting the second request for a service function from the second format into the canonical format;

performing the second requested service function based on the canonical format of the second request for a service function.

78. The method as set forth in claim 72, further comprising:

receiving a second request for a service function from a second user through the first remote device;

performing the second requested service function.

79. The method as set forth in claim 72, wherein the remote device comprises a display device.

80. The method as set forth in claim 72, wherein the one or more users include a



customer of the host site.

81. The method as set forth in claim 72, wherein the one or more users include an employee of the host site.

82. The method as set forth in claim 72, wherein the one or more users include a service provider external to the host site.

83. A system for delivering services to a user through a remote device, comprising:

a presentation manager for receiving a request for a service function from the user through the remote device and for converting the request into a canonical format; and

a transaction executor component for performing the requested service function based on the canonical format.

84. The system as set forth in claim 83, further comprising a welcome mat for collecting user identity and preference information.

85. The system as set forth in claim 84, further comprising a navigation shell for informing the user of available service functions based on the collected user identity and preference information.

86. The system as set forth in claim 84, further comprising a mini-app dialog component for collecting information relating to the requested service function from the user

through the remote device and for instantiating the transaction executor component.

87. The system as set forth in claim 86, further comprising a navigation shell instantiated by the welcome mat for receiving the requested service function from the presentation manager and for instantiating the mini-app dialog component.

88. The system as set forth in claim 84, further comprising a customer services set for providing a profile of the user based at least on the collected user identity.

89. The system as set forth in claim 88, wherein the customer services set comprises a customer identification (ID) component which contains information relating the user identity.

90. The system as set forth in claim 88, wherein the customer services set comprises a customer relationship component which contains information identifying a transactional relationship between the user and a host institution that provides the services to the user via the system.

91. The system as set forth in claim 88, wherein the customer services set comprises an issuer component which contains information about a host institution that uses the system to provide services to users.

92. The system as set forth in claim 88, wherein the customer services set comprises an acquirer component which contains information about an acquiring business for a session.

93. The system as set forth in claim 88, wherein the customer services set comprises an account component which contains information about one or more accounts of the user.

94. The system as set forth in claim 83, further comprising a session controller component for receiving an initial contact from the user through the remote device and for instantiating a session component for a session bubble associated with the user.

95. The system as set forth in claim 94, wherein the transaction executor component is associated with the session bubble.

96. The system as set forth in claim 95, wherein the session controller component is also for receiving an initial contact from another user through the remote device and for instantiating another session component for another session bubble associated with the another user.

97. The system as set forth in claim 96, further comprising another transaction executor component associated with the another session bubble.

98. The system as set forth in claim 97, further comprising a mini-app dialog component associated with each of the session bubbles for collecting information from the user of the respective session bubble and for instantiating the transaction executor component associated with the respective session bubble.

99. The system as set forth in claim 98, further comprising an interface component for interfacing with the users for the session bubbles and for routing the information from each user to the mini-app dialog component associated with the respective session bubble.

100. The system as set forth in claim 97, further comprising a back door man component for coordinating messages between the transaction executor components in the session bubbles and a single external service provider.

101. The system as set forth in claim 94, wherein the session component instantiates a welcome mat component for collecting the user's identity and preference information.

102. The system as set forth in claim 94, wherein the session controller component is also for receiving an initial contact from another user through the remote device and for instantiating another session component for another session bubble associated with the another user.

103. The system as set forth in claim 102, further comprising a system services set for providing common services to the session bubbles.

104. The system as set forth in claim 83, wherein the remote device comprises a display device.

105. The system as set forth in claim 83, wherein the user includes a customer of a host institution that uses the system to deliver services.

106. The system as set forth in claim 83, wherein the user includes an employee of a host institution that uses the system to deliver services.

107. The system as set forth in claim 83, wherein the user includes a service provider external to the system.

108. A system for delivering services from a host site to a remote device, comprising:  
a mini-app dialog component that receives a request for a service function from the remote device;

a transaction executor component instantiated by the mini-app dialog component to perform the requested service function; and

a rule broker component that selectively procures business rules from various sources in reply to rule queries from the mini-app dialog component and the transaction executor component.

109. The system of claim 108, wherein the business rules are grouped in geographic region specific sets.

110. A method for delivering services from a host site to one or more users through one or more remote devices, comprising:

receiving a first request for a service function from a first user through a first remote device, wherein the first request for a service function is in a first format designated for a first remote device;

converting the first request for a service function from the first format into a canonical format; and

performing the first requested service function based on the canonical format of the first request for a service function;

wherein performing the first requested service function includes applying a rule broker component to selectively procure business rules grouped in geographic region specific sets from various sources in reply to rule queries.

111. A system for delivering services to a user through a remote device, comprising:

a presentation manager that receives a request for a service function from the user through the remote device and for converting the request into a canonical format;

a transaction executor component that performs the requested service function based on the canonical format; and

a rule broker component that selectively procures and transmits business rules from various sources in reply to rule queries from the transaction executor component and the presentation manager component.